

Ackerman, Joyce

From: Ackerman, Joyce
Sent: Tuesday, April 3, 2018 9:17 AM
To: 'Richard Dean'; Jackie Rowley; Dave Folkes; Tobi L. Moore; Jonathan H. Steeler; Hunter Butler; Piggott, Amelia; O'Reilly, Maureen; Jenkins, Katherine; Stovall - CDPHE, Curtis; david.walker@state.co.us; Sandusky, Eric
Subject: Neuhauser Landfill - AOC

Dear Mr. Dean – As you know the AOC and Work Plan require that soils contaminated by drums be excavated and removed for off-site disposal. The Work Plan sets forth the following criteria for soils to be removed:

- Soil visibly contaminated by leaking drum or container contents;
- Soil with a strong odor consistent with drum or container contents;
- Soil with total VOC concentrations of 100 parts per million by volume (ppmv) or greater as determined by soil sample head-space screening using a flame ionization detector (PID); ...

EPA has been reviewing the laboratory data for soil samples taken from the stockpiles on-site, the rolloff boxes on-site, and the test pits within the excavations. Based on that review, the scope of work remaining at the Site to complete the AOC with regard to soil removal consists of the following:

1. Excavation of the areas of elevated contamination in the Phase 1 and Phase 2a excavations, as identified by test pitting and PID monitoring. Soils removed will require sampling for characterization and subsequent off-site disposal.
2. Removal of the stockpiles from the Phase 2b and Phase 3 excavations for off-site disposal.
3. Removal of the following stockpiles from the Phase 1 excavation: SP-1, SP-2, and SP-4 for off-site disposal. EPA notes that some of the samples from SP-1 showed relatively low levels of contamination. EPA would be willing to review any proposals to segregate high level contamination from lower levels in SP-1 in order to minimize quantities of soil requiring off-site disposal.
4. Removal of the rollofs containing contaminated soil for off-site disposal. EPA anticipates that soils from 10-13 rollofs will be allowed to be returned to the Site excavations and not require off-site disposal. EPA will specify to the Project Coordinator which rollofs can be emptied and soils returned to the excavations.

EPA is willing to review proposals for sampling of the excavations in Phases 1 and 2a to determine more specifically how much soil requires removal.

EPA is willing to review proposals for on-site treatment of soils in lieu of off-site disposal, such as chemical oxidation.

As you are aware, implementation of the Work Plan has taken significantly longer than expected. EPA believes it important to address the remaining threats to human health and the environment remaining on Site. To that end, please provide a schedule by the close of business on Monday April 9, 2018, outlining how Stratus plans

to complete this Work. EPA believes all the actions outlined above should be completed by the end of May, 2018. Should Stratus be unable to complete the work as described above, EPA will review other available options to ensure the work is completed in a timely and safe manner.

Thank you for your assistance.

Sincerely,

Joyce Ackerman
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